

1 Suzanne L. Martin
2 Nevada Bar No. 8833
3 suzanne.martin@ogletreedeakins.com
4 Brian L. Bradford
5 Nevada Bar No. 9518
6 brian.bradford@ogletreedeakins.com
7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
8 Wells Fargo Tower
Suite 1500
9 3800 Howard Hughes Parkway
Las Vegas, NV 89169
7 Telephone: 702.369.6800
8 Fax: 702.369.6888

9 *Attorneys for Defendant*
10 *CDI Contractors*

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**

13 RICHARD VELA, an individual,
14 Plaintiff,
15 vs.
16 CDI CONTRACTORS, LIMITED
LIABILITY COMPANY;
17 EMPLOYEE(S)/AGENT(S) DOES 1-10; and
ROE CORPORATIONS 11-20, inclusive,
18 Defendants.

19 Case No. 2:15-cv-01230-JAD-VCF

20 **STIPULATION AND ORDER FOR**
EXTENSION OF TIME TO REPLY TO
DEFENDANT'S PARTIAL MOTION TO
DISMISS

21 **(FIRST REQUEST)**

22 Pursuant to LR 6-1, 6-2, and 7-1, Plaintiff Richard Vela (“Plaintiff”) and Defendant CDI
23 Contractors, Limited Liability Company (“Defendant”), by and through their respective counsel,
24 have agreed to an extension of time for Defendant to file a reply to Plaintiff’s response to the
25 pending Partial Motion to Dismiss (Doc. 2), which was filed on June 29, 2015. The current
26 deadline for Defendant to file a reply is August 27, 2015. The parties respectfully request that the
27 reply date be extended to up to and including September 9, 2015.

28 The Early Neutral Evaluation (“ENE”) Session in this matter is set for August 27, 2015 and
the purpose of this request is to avoid any unnecessary fees and costs in connection with law and

1 motion if a settlement is reached at the ENE.

2 This is the parties' first request.

3 Accordingly, the parties hereby stipulate and agree as follows:

4 IT IS HEREBY STIPULATED that Defendant will have up to and including September 9,
5 2015, to file a reply to Plaintiff's response to the Partial Motion to Dismiss (Doc. 2).

6 This stipulation is made in good faith and is not intended for purposes of delay, but in the
7 interest of judicial economy.

8 DATED this 25th day of August, 2015.

8 DATED this 25th day of August, 2015.

9 JEFFREY GRONICH, ATTORNEY AT LAW,
10 P.C.

9 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

11 /s/ Jeffrey Gronich

11 /s/ Brian L. Bradford

12 Jeffrey Gronich

12 Suzanne L. Martin

13 Nevada Bar No. 13136

13 Nevada Bar No. 8833

14 1810 E. Sahara Avenue, Ste. 109

14 Brian Bradford

15 Las Vegas, NV 89104

15 Nevada Bar No. 9518

16 Attorney for Plaintiff

16 Wells Fargo Tower

17 Suite 1500

17 3800 Howard Hughes Parkway

18 Las Vegas, NV 89169

18 Attorneys for Defendants

19 **ORDER**

20 IT IS SO ORDERED.

21 
21 UNITED STATES DISTRICT COURT JUDGE

22 August 25, 2015

23 DATED